

Weatherization Grantee Health and Safety (H&S) Plan- *Optional Template* IHCDA

1.0 – GENERAL INFORMATION

Additional information that does not fit neatly in one of the other sections of this document.

See 2025 IHCDA WAP Policy & Procedure Manual for further Health & Safety Policy

- Section 3 Intake, Eligibility, and Application for At Risk Household definitions.
- Section 6 Program Management for Health & Safety measure cost definitions.
- Section 7 Funding & Production for Health & Safety budget category expenditure policies

See 2025 IHCDA WAP Policy & Procedure Manual for Deferral/Referral Policy

- Section 4 Service Provisions for Deferral policy
- Section 6 Program Management for Deferral Remediation measure cost definitions
- Section 7 Funding & Production for Readiness budget category expenditure policies

Where subrecipients must have approval before proceeding with a Health & Safety concern (as described below), contact IHCDA via email at iwx@ihcda.in.gov. This request must include the following:

- Pictures of the Health & Safety concern
- Documentation of the Health & Safety concern

2.0 – BUDGETING

Grantees are encouraged to budget H&S costs as a separate category and, thereby, exclude such costs from the Average Cost Per Unit (ACPU) cost limitation. This separate category also allows these costs to be isolated from energy efficiency costs in program evaluations. H&S costs that are budgeted and reported under the Program Operations category rather than the H&S category, the related H&S costs must be included in the calculation of the ACPU and cost-justified through the Grantee's Department of Energy (DOE)-approved energy audit tool.

Select which option used below.

Separate H&S Budget ☒

Contained in Program Operations ☐

3.0 – H&S EXPENDITURE LIMITS

Pursuant to [10 CFR 440.16\(h\)](#), Grantees must establish H&S expenditure limits for their Program and provide justification for those limits by explaining the basis and related historical H&S expenditures. DOE acknowledges that it may be necessary for Grantees to deviate from historical expenditures when certain circumstances arise (e.g., funding source changes).

[10 CFR 440.16\(h\)\(2\)](#) dictates that these limits must be expressed as a percentage of the ACPU. To calculate this percentage, use the following formula:

$$\text{Total Average H\&S Cost per Unit} = \frac{\text{H\&S budget amount}}{\text{Program Operations budget amount}}$$

For example, if the ACPU is \$5,000 and a Grantee's Program expends an average of \$750 per dwelling on energy-related H&S measures, the Total Average H&S Cost per Unit would equal 15 percent. DOE acknowledges that this percentage may vary significantly between Grantees due to different geographical areas and depending upon the availability of other funding sources, resource availability, etc. Low percentages should include a statement of what other funding supports H&S costs, while larger percentages will require greater justification and relevant historical support.

15 percent is not a maximum limit on H&S expenditures. DOE will conduct a secondary level of review on H&S Plans with a Grantee request of more than 15 percent of Program Operations used for H&S purposes. **DOE strongly encourages using the table below in developing justification for the requested H&S budget amount.** In accordance with [10 CFR 440.18\(d\)\(15\)](#), these funds are to be expended by the Program in direct weatherization activities, "of which is necessary before, or because of, installation of weatherization materials." This same section of the regulation excludes the H&S costs from the ACPU limitation if H&S costs are budgeted separately.

DOE recommends reviewing recent budget requests and compare those to actual H&S expenditures to see if previous budget estimates have been accurate. The resulting Total Average H&S Cost per Unit multiplied by the Grantee's production estimate in the Annual File should correlate to the H&S budget amount listed in the Grantee's annual plan.

H&S expenditure limits and justification explaining the basis for setting the limits.

The Limit on Health & Safety expenditures is 25% of the Base Operations. This amount will cover the costs of Health & Safety repairs. The remaining costs will be covered by other braided funds. Please see the Measure Matrix for cost justification per each listed measure.

Utilizing the spreadsheet embedded below, provide a full list of H&S measures using historical data from your program, including average cost, and frequency rate. If installing more than a single instance of one measure in a unit (e.g. multiple CO alarms), Grantees may aggregate costs so that frequency does not exceed 100%, or enter a justification into the measure column, which explains why that measure has a frequency rate of over 100%. The spreadsheet will auto calculate your expected Total Average H&S Cost per Unit.

Instructions: Double-click icon directly below to open, view and edit Measure Matrix Spreadsheet. Complete the spreadsheet by entering the required information. To save, close the spreadsheet and it will save to this document. Alternatively, the measure matrix is also available as a standalone spreadsheet located at the following link: [Weatherization Program Notice 22-7: Weatherization Health and Safety | Department of Energy](#)



Measure Matrix
Final.xlsx

4.0 – INCIDENTAL REPAIR MEASURES

Any measures that could potentially be identified as H&S, but the Grantee chooses to instead identify and treat those measures as incidental repair measures (IRMs), must be implemented consistently throughout the Grantee's weatherization program. The measure must fit the regulatory definition of an IRM and be cost justified along with the associated energy conservation measure and/or package of measures. [10 CFR 440.3](#) defines Incidental Repairs as, "those repairs necessary for the effective performance or preservation of weatherization materials."

H&S measures identified and treated as IRMs within your Program.

1. Source control (i.e. correction of moisture and mold creating conditions) is allowed when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measures. Some measures that address source

control may include, but are not limited to drainage, gutters, down spouts, extensions, flashing, sump pumps, dehumidifiers, landscaping, leaking roofs, etc. These measures are necessary for the effective performance or preservation of weatherization materials.

- If the home requires the installation or repair of a moisture barrier, drainage, flashing, sump pump, gutters, downspouts, extensions, flashing, dehumidifiers, or landscaping to ensure the insulation in the crawlspace or sidewalls remains fully intact, the cost of installing the barrier can be included as a necessary cost as a result of installing the insulation. If no insulation is being installed in the crawlspace and any of these items serve to prevent mold and moisture growth alone, this measure is considered a H&S cost. All IRM's costs must be justified using a NEAT/MHEA/MuTEA audit.
 - If the home requires the repair of a roof leak in order to protect insulation installed in the attic or sidewalls of the home, the cost can be considered an IRM.
2. A vapor or moisture barrier may be installed as either a H&S cost, or as an IRM to air sealing measures if the cost is justified as part of NEAT audit. Otherwise, this is a H&S cost.
 3. The installation of an ASHRAE fan may not be considered as an IRM to air sealing measures. ASHRAE fans must be considered an H&S cost.
 4. Minor Electrical Repairs, including the repair or replacement of knob and tube wiring, may be considered incidental repairs when associated with the installation and preservation of insulation in the attic or sidewalls. Otherwise, this is a H&S cost.
 5. Lead-Safe Work Practices may be considered an incidental repair when considering the ECM of insulating the sidewalls of a home. Otherwise, this is a H&S cost.
 6. Window and door repair, replacement, or installation is not an allowable H&S cost. These can be considered an ECM or IRM. Window or door air sealing can be an ECM, IRM, or H&S cost.
 7. Venting System Replacement: This can be considered an IRM of the ECM of replacing a heating system. Otherwise, this is a H&S cost.
 8. Ductwork Repair / Replacement: This can be considered an IRM of the ECM of replacing a heating system. Otherwise, this is a H&S cost.
 9. The installation of a chimney liner for an orphaned water heater may be considered as an IRM of the ECM of repairing or replacing a heating system. Otherwise, this is a H&S cost.
 10. Intumescent coating may be considered as an IRM of the ECM of two component foam. Otherwise, it could be an H&S cost.
 11. A/C system can be repaired or replaced as an IRM when it would protect an installed ECM. All A/C units must be evaluated as an ECM prior to utilizing H&S.

5.0 – OCCUPANT PRE-EXISTING OR POTENTIAL HEALTH CONDITIONS AND HAZARD IDENTIFICATION AND NOTIFICATION FORM(S)

Grantees must develop a written policy that includes, at a minimum, the following documentation relating to H&S Plan implementation and maintain signed copies in each client file. Each notification must include the occupant(s) (and landlord if applicable) name and address, be signed and dated by the occupant (and landlord if applicable) indicating that they understand and have been informed of their rights and options and signed by the Subgrantee personnel collecting the information.

Required topics are:

▪ **Occupant Pre-existing or Potential Health Condition Screening**

- *Provides documentation that allows occupant(s) to self-report known or suspected health concerns as part of initial application for weatherization, during the energy audit, or other part of the weatherization process as specified. Must minimally contain the following:*
 - *Any known risks associated with the measures and materials being installed*
 - *Subgrantee point of contact information for occupant(s)*

- Date of screening

▪ **Hazard Identification Notification**

- Provides documentation that the occupant and landlord (if applicable), have been informed of any potential hazards identified during the energy audit or intake process. Must minimally contain the following:
 - Date(s) of the energy audit/assessment and when the occupant(s) (and landlord, if applicable) was informed of a potential H&S issue
 - A clear description of the problem, including any testing results
 - A statement indicating if, or when weatherization could continue

Radon Informed Consent Form

- Provides documentation that the occupant(s) (and landlord if applicable) have been informed of any potential hazards associated with radon in weatherized dwellings. The form must minimally contain the following:
 - An explanation on the potential small risk of increasing radon levels when building tightness is improved. This is based on the results of the [Buildings Assessment of Radon Reduction Interventions with Energy retrofits Expansion Study \(The BEX Study\)](#)
 - A list of precautionary measures WAP will install based on [EPA Healthy Indoor Environment Protocols](#).
 - Some of the benefits of Weatherization including energy savings, energy cost savings, improved home comfort, and increased safety.

Procedure for soliciting occupants' health and safety concerns related to components of their homes

Subrecipient will use the Moisture Assessment Form to determine client Health & Safety concerns related to in-unit components.

Procedure for determining whether occupants suffer from health conditions which may be negatively impacted by the act of weatherizing their dwelling

Subrecipient will use the Health Screening Form to determine client health conditions that may be impacted by weatherization.

Procedure for addressing potential health concerns including pre-existing health conditions when they are identified

Subrecipient will use the Health Screening Form to determine client health conditions that may be impacted by weatherization.

Location where forms have been uploaded/submitted

Separate attachment to SF424 ☒

Separate attachment to H&S Plan ☐

6.0 – HEALTH AND SAFETY CATEGORIES

For each of the following H&S categories identified by DOE in the following tables, follow the directions below.

- Any section that is “Required” below must be explicitly detailed in the H&S Plan regardless of funding source used. If the Grantee checks the box for “Concurrence with DOE Guidance” the contents of the box may be left as it exists or reference the section/location within Grantee Policy and Procedure manual that contains language or insert Grantee specific language. If the “Alternative Guidance” box is checked, the Grantee must provide that alternative guidance in the box.
 - If a Grantee is proposing an alternative action/allowability for a “Required” item, the alternative requires comprehensive explanation of how it meets the intent of the DOE program notice.
 - If a “Required” item/category will not be addressed with any funding source and will always result in deferral, the H&S Plan must state that.
- Any section that is “Allowable” below must be detailed only if DOE WAP funds are used to implement the measures. If the Grantee uses DOE funds for any “Allowable” activities from the Table of Issues then they must be described here in detail, including defining “minor”, “major”, “limited”, “case-by-case”, and “at-risk” if the term is applied. If you only check the box “Allowed with Alternative Funds” then no additional information is required.
- Any section that is “Prohibited” below may not be addressed with DOE WAP H&S funds and does not need to be specifically addressed in the H&S Plan. The Grantee simply needs to check the “Concur with DOE guidance” box and indicate if the condition will result in deferral/referral.
- The Grantee H&S Plan may address additional H&S hazards specific to their program that are not included in the Table of Issues. If a Grantee chooses to include additional measures as DOE WAP funded H&S costs, the H&S Plan must include details pertaining to the measures allowed, testing required, and client education for these specific hazards.
- All required “Testing/Inspection” related items must be documented in the client file to verify completion and results.

6.1 – Air-Conditioning, Heating Systems, and Combustion Appliances

Required Actions

Concur with DOE Guidance ☒

Alternative Guidance ☐

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒

Alternative Funds ☐

If the heating system is operable, the system must be run through NEAT/MHEA/MulTEA first to determine if it is allowable to be replaced as an energy conservation measure. "Red tagged," inoperable or nonexistent heating system replacement, repair, or installation is allowed with DOE funds and LIHEAP funds. Repairs to outside units is generally not allowable. Repairs can be charged as DOE Health and Safety cost or LIHEAP Support cost. The subgrantee must first determine whether repairs can effectively be made to the heating system to enable it to operate safely, rather than require a replacement.

Unsafe secondary units, including space heaters must be removed, rendered inoperable, or the home must be deferred.

Following [WPN 22-7](#), secondary unvented units that conform to the safety standards of ANSI Z21.11.2 may remain as back-up heat sources. DOE is allowing this flexibility primarily to provide low-income clients an emergency back-up source of heat in the event of electrical power outages. To leave a secondary unit behind as a secondary source of heat, the unit must pass the IHCD Unvented Space Heater Inspection and be properly documented on the form.

Secondary unvented units that do not meet ANSI Z21.11.2 must be removed and properly disposed of prior to weatherization but may remain until a replacement heating system is in place. Repair of secondary unvented units is not allowed. Secondary unvented units that meet the ANSI Z21.11.2, but are not operating safely, must be removed and properly disposed of.

An unvented gas- or liquid-fueled space heaters that remain after weatherization shall:

- Not have an input rating in excess of 40,000 Btu/hour
- Not be located in, or obtain combustion air from sleeping rooms, bathrooms, toilet rooms, or storage closets

Unvented gas- or liquid-fueled space heaters must be removed and properly disposed of prior to weatherization in manufactured homes.

Allowable Actions

Allowed with DOE WAP H&S Funds ☒

Allowed with Alternative Funds ☐

Sub-grantees are allowed to replace heating systems in the following circumstances:

- A verifiable condition exists that allows combustion gases to enter the living environment. For example, a breach in the heat exchanger that allows combustion gases to mix with the air in the ductwork.
- An improper application of a non-sealed combustion furnace installed in a manufactured home. Manufactured homes are required to have furnaces that draw their combustion air from outside the carriage. All new furnace installations in manufactured homes must be approved for use in manufactured housing.
- Heating systems can be replaced when the NEAT, MHEA, or MulTEA audit shows the replacement to meet an SIR of 1 or greater. Subgrantees must run a NEAT/MHEA/MulTEA audit when DOE funding is used to pay for a furnace replacement. The NEAT/MHEA/MulTEA work scope must be followed once a NEAT/MHEA/MulTEA audit has been performed on a structure.
- The cost of necessary repairs will exceed 50% of the cost of replacing the heating system.
- Replacement parts are no longer produced or available.
- If the fuel source is no longer available to the client, the Subgrantee must submit a request to IHCDa requesting the change of the fuel source and heating system, and requests will be evaluated on a case-by-case basis.
- A/C system repair or replacement may utilize H&S funding when documented medical justification by a physician is in the file.

New HVAC system selection must comply with [SWS](#)

The subgrantee may not continue with weatherization work, particularly air sealing the structure until the combustion gases have been appropriately vented away from the living area.

Before an HVAC system is installed in a unit, a Manual J must be completed. NEAT/MHEA/MulTEA is not approved heat load calculation tools.

HVAC system replacements in Indiana’s Weatherization Assistance Program are justified by utilizing Indiana's Heating Degree Days; the lower one-third of the state has a range of 4000 – 5499, and 5500 – 7000 for the upper two-thirds of the State. This climatic information is incorporated into Indiana’s NEAT, MHEA, and MulTEA runs.

Auditors determine and document presence of “at-risk” current occupants when installing any Health and Safety measure. Sub-grantees are required to complete the Occupant Health Screening Form.

Prohibited Actions	
Concur with DOE Guidance <input checked="" type="checkbox"/>	
IHCDa does not permit any DOE-funded weatherization work on electric space heaters. Repair, replacement, or installation of electric standalone space heaters is not allowed. Removal of these space heaters is recommended. The energy auditor is required to perform a complete evaluation of the heating system on each unit weatherized. Part of this evaluation will be determining what modifications or replacements are required. Stand-alone electric heaters cannot be left in place as a client’s sole source of heat. If provisions cannot be made for the installation of a permanent heating source, the home must be deferred. In instances where a new heating system is installed, the client will be educated on the new heating system and advised against using the stand-alone electric space heater. Should the stand-alone electric space heater be found to be unsafe for use in the client’s home, it must be removed from use prior to weatherization proceeding.	
Required Testing/Inspection	
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>

If the heating system is operable, the system must be run through NEAT/MHEA/MulTEA first to determine if it is allowable to be replaced as an energy conservation measure. "Red tagged," inoperable or nonexistent heating system replacement, repair, or installation is allowed with DOE funds and LIHEAP funds. Repairs to outside units is generally not allowable. Repairs can be charged as DOE Health and Safety cost or LIHEAP Support cost. The subgrantee must first determine whether repairs can effectively be made to the heating system to enable it to operate safely, rather than require a replacement.

Sub-grantees are allowed to replace heating systems in the following circumstances:

- A verifiable condition exists that allows combustion gases to enter the living environment. For example, a breach in the heat exchanger that allows combustion gases to mix with the air in the ductwork.
- An improper application of a non-sealed combustion furnace installed in a manufactured home. Manufactured homes are required to have furnaces that draw their combustion air from outside the carriage. All new furnace installations in manufactured homes must be approved for use in manufactured housing.
- Heating systems can be replaced when the NEAT, MHEA, or MulTEA audit shows the replacement to meet an SIR of 1 or greater. Subgrantees must run a NEAT/MHEA/MulTEA audit when DOE funding is used to pay for a furnace replacement. The NEAT/MHEA/MulTEA work scope must be followed once a NEAT/MHEA/MulTEA audit has been performed on a structure.
- The cost of necessary repairs will exceed 50% of the cost of replacing the heating system.
- Replacement parts are no longer produced or available.
- If the fuel source is no longer available to the client, the Subgrantee must submit a request to IHCD requesting the change of the fuel source and heating system, and requests will be evaluated on a case-by-case basis.
- A/C system repair or replacement may utilize H&S funding when documented medical justification by a physician is in the file.

New HVAC system selection must comply with [SWS](#)

The subgrantee may not continue with weatherization work, particularly air sealing the structure until the combustion gases have been appropriately vented away from the living area.

Before an HVAC system is installed in a unit, a Manual J must be completed. NEAT/MHEA/MulTEA is not approved heat load calculation tools.

HVAC system replacements in Indiana's Weatherization Assistance Program are justified by utilizing Indiana's Heating Degree Days; the lower one-third of the state has a range of 4000 – 5499, and 5500 – 7000 for the upper two-thirds of the State. This climatic information is incorporated into Indiana's NEAT, MHEA, and MulTEA runs.

Unsafe secondary units, including space heaters must be removed, rendered inoperable, or the home must be deferred.

Following [WPN 22-7](#), secondary unvented units that conform to the safety standards of ANSI Z21.11.2 may remain as back-up heat sources. DOE is allowing this flexibility primarily to provide low-income clients an emergency back-up source of heat in the event of electrical power outages. To leave a secondary unit behind as a secondary source of heat, the unit must pass the IHCD Unvented Space Heater Inspection and be properly documented on the form.

Secondary unvented units that do not meet ANSI Z21.11.2 must be removed and properly disposed of prior to weatherization but may remain until a replacement heating system is in place. Repair of secondary unvented units is not allowed. Secondary unvented units that meet the ANSI Z21.11.2, but are not operating safely, must be removed and properly disposed of.

An unvented gas- or liquid-fueled space heaters that remain after weatherization shall:

- Not have an input rating in excess of 40,000 Btu/hour

- Not be located in, or obtain combustion air from sleeping rooms, bathrooms, toilet rooms, or storage closets

IHCDA does not permit any DOE-funded weatherization work on electric space heaters. Repair, replacement, or installation of electric standalone space heaters is not allowed. Removal of these space heaters is recommended. The energy auditor is required to perform a complete evaluation of the heating system on each unit weatherized. Part of this evaluation will be determining what modifications or replacements are required. Stand-alone electric heaters cannot be left in place as a client's sole source of heat. If provisions cannot be made for the installation of a permanent heating source, the home must be deferred. In instances where a new heating system is installed, the client will be educated on the new heating system and advised against using the stand-alone electric space heater. Should the stand-alone electric space heater be found to be unsafe for use in the client's home, it must be removed from use prior to weatherization proceeding.

Unvented gas- or liquid-fueled space heaters must be removed and properly disposed of prior to weatherization in manufactured homes.

Grantee Combustion Testing Action Levels

Health and safety inspections ensure that systems are present, operable, and performing. The health and safety inspection of combustion appliances, include but are not limited to the following items:

- Combustion safety testing is required when combustion appliances are present
- Test naturally drafting appliances for spillage and CO during CAZ depressurization testing pre- and post-weatherization and before leaving the home on any day when work has been done that could affect draft (e.g., tightening the home, adding exhaust)
- Inspect venting of combustion appliances and confirm adequate clearances
- Utilize the NEAT/MHEA/MulTEA audit to determine if the appliance can be justified as an ECM prior to replacement as an H&S measure
- The rated and measured BTU input of each combustion appliance
- A complete electrical inspection of the furnace including proper grounding, polarity, wiring connections, fuse type and size, element amperage (electrical furnace), disconnect requirements and conduit requirements
- An inspection of all fuel lines in the home from the source to the combustion appliance or line termination. This includes all fittings, connections, shut-off valves, gas valves, sediment traps and end caps
- An inspection for spillage and a reading of the draft of gas/oil furnaces and water heaters (Completion of the appropriate Inspection Form)
- A visual check for flame interference
- A test of the setting and operation of the high limit control switch
- An evaluation of the adequacy of combustion air for combustion appliances
- A check that there are no open return air ducts/leaks in the Combustion Appliance Zone
- Carbon monoxide testing of all combustion appliances
- An inspection, and replacement if necessary, of the furnace filter
- Worst case CAZ depressurization and Indiana Daily Safety Test-Out Form

Grantee Woodstove & Fireplace inspection/testing policy including actions/limits

Concur with DOE Guidance ☒

Alternative Guidance ☐

Decommissioning of an unvented space heater

In the event an unvented space heater is required to be removed from the unit the following must be completed:

- Remove unvented space heater from the unit
- Equipment will be disposed of in accordance with local laws and regulations, recycling materials when feasible
- Gas line shall be removed and capped as close to branch tee as possible
- Cap shall be tested for gas leaks after gas line is removed

Decommissioning of abandoned vent systems

When vent systems are no longer being utilized, the following must be completed for:

- **Masonry Chimney:** Vent connectors must be removed. Interior masonry chimney connector opening must be sealed with metal cap, cement/mortar, or a combination of metal cap and cement/mortar.
- **Type B-vent and Manufactured Vent System:** Vent sections must be removed as far away from disconnection as practical, (i.e. typically at ceiling level) and sealed with a metal cap

The decommissioned vents must be tagged as “Unsafe To Use”

Decommissioning of gas fireplace

- Gas line shall be removed and capped as close to branch tee as possible
- Cap shall be tested for gas leaks after gas line is removed
- Depending on the vent system type, refer below to applicable protocols:
 - **Type B-vent and Manufactured Vent System:** Vent sections must be removed as far away from disconnection as practical, (i.e. typically at ceiling level) and sealed with a metal cap

The decommissioned vent must be tagged as “Unsafe To Use”

Decommissioning of solid fuel open hearth fireplace

Exterior

- Cover chimney top with a chimney cap with an animal screen/guard
- Top of chimney should NOT be permanently disabled/airsealed
- Safety of weatherization professionals is paramount
- If a chimney cap is not a feasible option, sub-grantee must include meaningful photograph(s) and written justification in the file.

Interior

- Install foam board and drywall with a support structure to ensure durability
- The decommissioned fireplace must be tagged as “Unsafe to Use”

When a solid fuel open hearth fireplace is present, the blower door must be operated at 300 cfm to simulate a fire in the fireplace. If open hearth fireplace is left operating post weatherization, it must be inspected by a qualified chimney sweep and must be deemed safe to use. A copy of this letter must be placed in the client file. The Worst-Case CAZ Depressurization limit for a wood stove which obtains combustion air from the home is -4.0 Pascals of pressure. The Worst-Case CAZ Depressurization limit for an EPA approved direct vent wood stove is -10.0 Pascals of pressure. If either of these limits are met or exceeded, the respective wood stove will require decommissioning. A copy of the Worst-Case Testing form for all of the above-mentioned ventilations systems must be in the client file.

Required Occupant Education	
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>

When deferral is necessary, provide information to the client, in writing, describing conditions that must be met in order for weatherization to commence. A copy of this notification must also be placed in the client file. Discuss appropriate use and maintenance of units. Provide all paperwork and manuals for any installed equipment. Discuss and provide information on proper disposal of bulk fuel tanks when not removed as part of the weatherization work. Where combustion equipment is present, provide safety information including how to recognize depressurization. Clients will be provided with combustion safety and hazards information, including the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit the production of CO.

6.2 – Asbestos (Confirmed and/or Presumed Asbestos Containing Material)

Required Actions

Concur with DOE Guidance ☒

Alternative Guidance ☐

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒

Alternative Funds ☐

Weatherization workers must recognize materials that may contain asbestos and avoid disturbing them. Per [WPN 22-7](#), When suspected asbestos containing materials are present, assume that asbestos is present unless testing has determined otherwise.

- Asbestos Hazard Emergency Response Act of 1986 (AHERA) sample collection and testing must be conducted by a certified asbestos control professional.
- Baseline environmental asbestos sampling is an allowable H&S cost.
- Instruct clients in writing not to disturb suspected ACM.
- AHERA or other appropriate asbestos control professional certification/training is required to abate ACM.
- AHERA or other appropriate asbestos control professional certification/training is required for encapsulation.

If the Subgrantee has deferred a home which then results in the owner facilitates removal of asbestos containing materials, it is required that the proper documentation validating removal was completed by a trained asbestos professional be provided to the Subgrantee prior to allowing weatherization services to move forward.

Grantee ACM policy

Vermiculite

If vermiculite insulation is found in a unit and that vermiculite insulation will require disturbance in order to complete weatherization activities, then the vermiculite insulation must either:

- Be tested by an AHERA professional to determine if asbestos is present or
- Must be assumed to contain asbestos.

If it is tested and the results are positive, then either (a) the ACM must be removed in accordance with [WPN 22-7](#) guidance prior to weatherization activities commencing or (b) the home must be deferred until the ACM can be removed in accordance with [WPN 22-7](#).

- When vermiculite is present and it is determined that testing will be completed testing is required by an AHERA or other appropriate asbestos control professional.
- If asbestos is present, the home must be able to be weatherized without asbestos disturbance. If it can't, then it must be deferred.
- Do not perform a blower door depressurization test.
- A blower door pressurization test is allowable.
- Use proper respiratory protection while in areas containing vermiculite.
- Encapsulation by an appropriately trained asbestos control professional is allowed.
- Removal is not an allowable cost.

When deferral is necessary due to asbestos, occupant must provide documentation that a certified professional performed the remediation before work continues.

Pipes, Furnaces, other small, covered surfaces

- Assume asbestos is present in suspect covering materials.
- When suspected friable ACM is present, take precautionary measures as if it is asbestos unless testing determines otherwise.
- Encapsulation by an appropriately trained asbestos control professional is allowed and may be conducted prior to blower door testing if the materials are friable.
- Subgrantee may be allowed to remove by an appropriately trained professional on a case-by-case basis.
- Grantees must state in the H&S Plan what criteria the Grantee uses when reviewing requests.
- Charge only those costs directly associated with the testing, encapsulation, or removal to the H&S budget category.
- When deferral is necessary due to asbestos, occupant must provide documentation that a certified professional performed the remediation before work continues

Grantee Blower Door Testing Policy When Suspected ACM Exists

Subgrantees must not perform a blower door depressurization test in a building where friable asbestos, suspected asbestos containing insulation or vermiculite are present. Unless the suspect material has tested negative for asbestos, a blower door pressurization test must be performed, and must be documented in the client file.

Allowable Actions

Allowed with DOE WAP H&S Funds ☒

Allowed with Alternative Funds ☒

N/A

Prohibited Actions

Concur with DOE Guidance ☐

Using DOE WAP H&S funds for general abatement/removal/or replacement of asbestos siding, thermal system insulation (TSI) or Transite, or vermiculite is prohibited.

Required Testing/Inspection

Concur with DOE Guidance ☒

Alternative Guidance ☐

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒

Alternative Funds ☐

<ul style="list-style-type: none"> Assess whether suspected ACMs are present. AHERA sample collection and testing is allowed and must be conducted by a certified tester. 	
Allowable Testing/Inspection	
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
N/A	
Required Occupant Education	
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
<ul style="list-style-type: none"> Instruct clients in writing not to disturb suspected ACM. Provide asbestos safety information to the client. Formally notify client in writing of results if testing was performed. When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence. 	

6.3 – Biologicals and Unsanitary Conditions		
Required Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
Remediation of conditions that may lead to or promote biological concerns and unsanitary conditions is allowed. Deferral may be necessary in cases where conditions in the home pose a health risk to occupants and/or weatherization workers.		
Allowed Actions		
Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
N/A		
Required Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
Sensory inspection of interior, exterior, attics, and subspaces of the dwelling.		
Prohibited Testing/Inspection		
Concur with DOE Guidance <input type="checkbox"/>		
Addressing bacteria and viruses is not an allowable cost.		
Required Occupant Education		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	
The designated weatherization professional will inform the client, in writing, of observed conditions. Auditors will provide information on how to maintain a sanitary home and steps to correct deferral conditions. When deferral is necessary, provide information in writing describing conditions that must be met for Weatherization to commence.		

6.4 – Building Structure and Roofing (e.g., roofing, wall, foundation)	
Allowable Actions	
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>
Minor repairs and installation may be conducted only when the H&S of the occupant/worker(s) is at risk, or necessary to effectively weatherize the home; otherwise, these measures are not allowed. Allowable or “minor” structural and roofing repairs are considered as either H&S repair costs, or included as Incidental repairs. Units that require more than minor repairs must be deferred.	
Prohibited Actions	
Concur with DOE Guidance <input checked="" type="checkbox"/>	
Using DOE WAP H&S funds for major repairs as defined by Grantee’s H&S Plan. Building rehabilitation is prohibited	
Define “major” repairs	

A repair exceeding \$1,200.00 for one measure is considered a major repair.		
Required Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input checked="" type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>		Alternative Funds <input checked="" type="checkbox"/>
Visual inspection of building structure and roofing for damages that compromise building durability and to verify that portions of the home where weatherization will occur are safe for entry and performance of assessments, work, and inspections.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>		Allowed with Alternative Funds <input type="checkbox"/>
N/A		
Prohibited Testing/Inspection		
Concur with DOE Guidance <input type="checkbox"/>		
Using DOE WAP H&S funds for any testing/evaluation of structural materials by a third-party is prohibited.		
Required Occupant Education		
Concur with DOE Guidance <input type="checkbox"/>		Alternative Guidance <input type="checkbox"/>
Notify client in writing of structurally compromised areas. When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.		

6.5 – Code Compliance		
Allowable Actions		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
<p>When correction of preexisting code compliance issues is triggered, and paid for with WAP funds, document specific code requirements with reference to the weatherization measure(s) that triggered the code compliance issue in the client file. Follow State and local or AHJ codes while installing weatherization measures, including H&S measures. Condemned properties or dwellings where H&S conditions exist that cannot be corrected under this guidance must be deferred. The following examples commonly trigger code compliance work requirements in Indiana:</p> <ul style="list-style-type: none"> • Expansion tank installation for newly installed water heaters is a common code compliance issue. • A wire splice is not in a junction box. <p>In every case of code compliance, Indiana indicates that the local code requirement is the AHJ, and if it is determined that the code compliance issue cannot be resolved using traditional weatherization funds, the home must be deferred.</p>		
Prohibited Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
Correction of preexisting code compliance issues is not an allowable cost unless triggered by weatherization measures being installed in a specific room or area of the home.		
Required Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>		Alternative Funds <input type="checkbox"/>
Visual inspection.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>		Allowed with Alternative Funds <input type="checkbox"/>
N/A		
Required Occupant Education		
Concur with DOE Guidance <input checked="" type="checkbox"/>		Alternative Guidance <input type="checkbox"/>
Inform client in writing of observed code compliance issues when it results in a deferral. When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.		

6.6 – Electrical		
Required Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input checked="" type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	
<p>Per the electrical inspection section of the SWS-Aligned Indiana Weatherization Field Guide, auditors identify any knob and tube wiring found in the dwelling and test it to see if it is live. Live knob and tube wiring can never be covered by insulation as a result of any weatherization measure. Damming of knob and tube wiring prior to insulation is acceptable. Existing insulation covering live knob and tube shall not be removed. Nor shall additional insulation be added above the knob and tube. Inspect for the presence and condition of knob-and-tube wiring and check for alterations that might create an electrical hazard. If knob-and-tube integrity is questionable, have it inspected by an electrician.</p>		
Allowable Actions		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
<p>Minor repairs are generally defined as, but not limited to, the following: Installation of junction boxes, installation of junction box covers, flagging of junction boxes, replacement of broken outlets and switches, etc. The replacement of Installing a new electrical panel, new incoming service or completely rewiring a home are not considered minor electrical repairs. Knob and Tube wiring may be replaced as an Incidental Repair.</p>		
Prohibited Actions		
Concur with DOE Guidance <input type="checkbox"/>		
Using DOE WAP H&S funds for major electrical repairs as defined by the Grantee's H&S plan is prohibited		
Define "major" repairs		
A repair exceeding \$1,200.00 for one measure is considered a major repair.		
Required Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input checked="" type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	
<ul style="list-style-type: none"> Visual inspection for presence and condition of knob-and-tube wiring. Evaluate knob-and-tube wiring for safety prior to work. Check for alterations that may create an electrical hazard. 		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
N/A		
Required Occupant Education		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	
When electrical issues are the cause of a deferral, auditors will provide clients with information on over-current protection, overloading circuits, and basic electrical safety and risks.		

6.7 – Fuel Leaks		
Required Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
<p>When a minor gas leak is found on the utility side of service, the utility service must be contacted before work may proceed. Fuel leaks that are the responsibility of the client (vs. the utility) must be repaired before weatherizing a unit. Notify utilities and temporarily halt work when leaks are discovered that are the responsibility of the utility to address.</p>		
Allowable Actions		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	

Allowable fuel leak repairs are considered repairs made to the fuel system when (non-utility responsible) leaks are found at any point during the weatherization process. Fuel leaks found during the initial inspection that are beyond budgetary restraints may be deferred.		
Prohibited Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
Using DOE WAP H&S funds to repair leaks that are the responsibility of the utility to correct is prohibited. Using DOE WAP H&S funds for environmental cleanup resulting from bulk fuel leaks is prohibited		
Required Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
Test all exposed gas lines, fittings, valves, and connections for fuel leaks from utility connection to the appliance throughout the home. Test all gas appliances for fuel leaks at all connections, valves, fittings, and burners. Conduct sensory inspection of all bulk fuels lines and storage tanks to determine if leaks exist.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
N/A		
Prohibited Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
Using DOE WAP H&S funds for environmental testing of soil or water is prohibited.		
Required Occupant Education		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	
Informed clients in writing if fuel leaks are detected.		

6.8 – Gas Ovens/Stovetops/Ranges		
Allowable Actions		
Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
When testing indicates a problem, Subgrantees may perform standard maintenance on or repair gas cooktops and ovens. Replacement is not allowed using DOE funds. LIHEAP or other alternative funds may be used to replace the unit.		
Required Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	
Test for gas leaks in the gas piping in and around the range and oven. Turn the oven burner and then range burners to high one-by-one. Inspect the flames and test them for CO. For the oven burner, test at its outlet. For range burners, hold the test probe approximately 8 inches above the flame.		
Define action levels for oven CO testing and resulting actions		
For range tops, if after servicing, the CO level still exceeds 100 ppm as measured on any one burner and at a minimum a kitchen rated CO alarm must be installed in the same room as the appliance and perform client education on use of the range. For ovens, if after servicing, the CO level still exceeds 225 ppm as measured, install a CO alarm in the same room as the appliance. Additionally, install a kitchen exhaust fan (minimum 100 cfm) to vent the CO to the exterior OR replace the range. A kitchen rated CO alarm must be installed. Gas ovens, stovetops, and ranges must be replaced using non-DOE funds.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
N/A		
Required Occupant Education		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	

Inform occupants of the importance of using exhaust ventilation when cooking and the importance of keeping burners and broilers clean to limit the production of CO.

6.9 – Hazardous Materials

Required Actions

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input type="checkbox"/>	

If pollutants pose a risk to workers and removal cannot be performed or is not allowed by the client, the unit must be deferred. Refer to Hazardous Materials Disposal section of WPN 22-7 for more information. Air sealing house-garage wall can be an ECM or H&S cost. Hazardous waste materials generated in the course of weatherization work shall be disposed of according to all local laws, regulations and/or Federal guidelines, as applicable. Document proper disposal requirements in contract language with responsible party.

Define “limited” removal of pollutants

Removal of pollutants is limited to those that pose a risk to workers or occupants and would not otherwise result in deferral. Hazardous pollutants include but are not limited to the following:

- Formaldehyde
- Volatile Organic Compounds (VOCs)
- Flammable Liquids
- Refrigerant
- Mercury
- CFL
- Fluorescents

Allowable Actions

Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
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Removal of pollutants is allowed and is required if they pose a risk to workers or occupants.

Prohibited Actions

Concur with DOE Guidance ☐

Using DOE WAP H&S funds for Lead, Asbestos, and Radon abatement is prohibited.

Required Testing/Inspection

Concur with DOE Guidance <input type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input type="checkbox"/>	Alternative Funds <input type="checkbox"/>	

A sensory inspection will be conducted.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
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N/A

Prohibited Testing/Inspection

Concur with DOE Guidance ☐

Using DOE WAP H&S funds for any testing for hazardous materials other than that specifically permitted in the asbestos, lead, and radon sections of this document is prohibited.

Required Occupant Education

Concur with DOE Guidance <input type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
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Inform client in writing of observed hazardous condition and associated risks. Provide client written materials on safety issues and proper disposal of household pollutants. When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

6.10 - Injury Prevention of Occupants

Allowable Actions

Allowed with DOE WAP H&S Funds ☒

Allowed with Alternative Funds ☐

When a person's health may be at risk and/or the work activities could constitute a health or safety hazard, the occupant at risk will be required to take appropriate action based on severity of risk. Failure or the inability to take appropriate actions must result in deferral. IHCD has created an Occupant Health Screening Form, which gives the client the guidance and opportunity to disclose their refusal of products or weatherization measures that they or their physician may deem a potential compromise to their health and/or wellbeing.

Prohibited Actions

Concur with DOE Guidance ☒

Using DOE WAP H&S funds for major repairs, as defined by the Grantee's H&S Plan is prohibited

Define "major" repairs

A repair exceeding \$1,200.00 for one measure is considered a major repair.

Required Testing/Inspection

Concur with DOE Guidance ☒

Alternative Guidance ☐

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒

Alternative Funds ☐

Visually inspect for dangers that would prevent weatherization.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds ☐

Allowed with Alternative Funds ☐

N/A

Required Occupant Education

Concur with DOE Guidance ☐

Alternative Guidance ☐

IHCDA has created an Occupant Health Screening Form. Sub-grantees inform clients in writing of any known risks. When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

6.11 – Lead-Based Surface Coverings (Paint, Varnishes, Roofing, etc.)

Required Actions

Concur with DOE Guidance ☒

Alternative Guidance ☐

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒

Alternative Funds ☐

The EPA is the governmental agency which regulates lead. The Department of Energy guidelines adhere to the EPA Lead Renovation, Repair, and Painting Program. This program mandates the following, but is not limited to:

- Subrecipient staff and contractors must follow EPA Lead: Renovations, Repair and Painting Program (RRP) when working in pre-1978 housing unless testing confirms the work area to be lead free.
- Deferral is required when the extent and condition of lead-based paint in the unit would potentially create further H&S hazards.
- Only those costs directly associated with the testing and lead safe practices for surfaces directly disturbed during weatherization activities are allowable.
- Documentation in the client file must include:
 - Certified Renovator certifications
 - EPA firm certification
 - OTJ training for employees who are not the CR
 - Lead testing report completed by designated XRF handler
 - Client signed document verifying receipt of the EPA Renovate Right within 60 days of the start of the work
 - EPA compliant record keeping checklist
 - Photographs of lead safe work practices must include all tasks required on the Sample Renovations Recordkeeping Checklist
- Testing to determine the presence of lead in paint that will be disturbed by Wx measure installation is allowed with EPA-approved testing methods
- Jobsite set-up and cleaning verification by a Certified Renovator is required
- All employees and contractors working on pre-1978 units must receive training to install measures in a lead-safe manner in accordance with the EPA and [WPN 22-7](#) protocols and installation must be overseen by an EPA Certified Renovator

IHCDA monitoring will verify subrecipients are utilizing proper lead safe protocols and will verify each subrecipient and subcontractor maintain training for the X-Ray Fluorescence Spectrometer (XRF) analyzer for resourcing and leak testing.

All subrecipients and contracted Wx subcontractors performing work in units built prior to 1978 are required, but not limited to the following:

- Obtain and maintain Lead Safe Certified Firm status through the EPA. This must be renewed every five years. Subrecipients may check their status through EPA's [Lead Renovation/ Abatement Firm Certification Application or Update](#). All certifications will be verified during the annual monitoring process.
 - An EPA approved Certified Renovator (RRP) must be present during lead safe set up, readily available via in person, via telephone, or via email throughout the duration of the project; and be present at the completion of the project.
- The EPA RRP Certified Renovator must provide a completed Renovator Checklist to the subrecipient Wx Program Manager or the manager's designee.
- Provide meaningful photographs documenting all points of EPA lead requirements.
- Follow all requirements set forth by the EPA and all other Authority Having Jurisdiction (AHJ)
- Obtain confirmation of receipt (*Appendix H - Client Consent Form – 2024*) of the EPA-Renovate Right lead pamphlet from the owner, adult representative, or occupants (as applicable), or a certificate of mailing from the United State Postal Service (USPS) for all units built prior to 1978.
- Ensure documentation that the required EPA education and documents have been provided to unit owner and applicable occupants.
- Adhere to IHCDA "We Care About Lead" policy.
 - Attend the Lead Safe Wx course held at the WAP Training Provider.
 - Must use an EPA approved lead test or an XRF lead paint analyzer.
- Only devices with a posted PCS may be used for lead paint inspections. If you use an XRF without a current PCS or do not follow the requirements of the PCS, the work will be considered invalid and the work will have to be re-done. To obtain

the appropriate XRF Performance Characteristic Sheet, contact the National Lead Information Center Clearinghouse (1-800-424-LEAD)

- Ensure the program recordkeeping requirements are met, including retaining the following for a minimum of 3 years:
 - Lead Inspection report certifying lead-based paint is or is not present.
 - Records confirming distribution of EPA's lead hazard information guide "[Renovate Right](#)" before starting renovation work for sample document.
 - Documentation of compliance with the requirements of the EPA when there is disturbance of lead paint at the unit.

Subrecipient staff and contractors working in weatherization units are trained on how to adhere to safe work practices ensuring adherence to the following, but not limited to, EPA, OSHA, [29 CFR 1910](#) and [29 CFR 1926](#). Subrecipient must ensure Wx staff are provided with and trained on the use of appropriate Personal Protective Equipment (PPE) per appropriate OSHA and CFRs regulations/laws as applicable. Subrecipients performing weatherization services are encouraged to obtain Pollution Occurrence Insurance. The policy cannot exclude lead if DOE funds are used to purchase the policy. If Grantees or Subrecipients do not obtain POI coverage and damage occurs or there is disturbance to any other environmental pollutants, the cost of remediation, clean up, relocation, medical expenses, or any other resulting costs may not be charged to DOE Weatherization and must be covered by another funding source.

Subrecipients are required to ensure new weatherization employees are trained on lead safe work practices and provided with proper PPE, at minimum, within the first 9 months and 45 days of employment to protect employees from the hazards of lead during weatherization work. Subrecipient weatherization professionals may not engage in lead renovation activities until they receive proper training and PPE. It is highly recommended that all Program Managers and Executive Directors attend training related to lead and applicable PPE to ensure a minimum level of liability compliance understanding for the subrecipient.

Allowable Actions

Allowed with DOE WAP H&S Funds ☒

Allowed with Alternative Funds ☐

N/A

Prohibited Actions

Concur with DOE Guidance ☒

Using DOE WAP H&S funds for lead abatement is prohibited. Using DOE WAP H&S funds for purchase, resourcing, or maintenance of X-ray Fluorescence (XRF) devices is prohibited.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds ☒

Allowed with Alternative Funds ☐

All units built pre-1978 are required to be tested for the presence of lead prior to any work commencing, including work completed with deferral funds. Each subrecipient has at least one XRF analyzer. Resourcing or purchasing an XRF is an allowable DOE funded cost. The cost of purchasing a new XRF or Resourcing an existing XRF, in which the cost exceeds \$10,000.00 requires written permission from IHCD prior to the expenditure. In the event the subrecipient XRF is out of commission, contact the WAP Training Provider for coordination of a temporary loaner XRF. Each subrecipient must have at least one designated staff member who is trained and refreshed annually at either the WAP Training Provider's SATT or CMR on use and handling of the XRF Analyzer.

Weatherization Managers are free to allow the XRF designee to train their employees in the use and handling of the XRF gun. A subrecipient wishing to receive further training for Lead Safe Weatherization may allocate T&TA funds for EMI's Lead Risk Assessor and/or Inspector's courses (or other training providers contingent on IHCD approval), although it is not mandatory.

It is required Wx manager or XRF Analyzer Designee prepare a compliant report and that a copy of this report be placed in the client file. In the event a contractor is completing work in this unit, the contractor must also be forwarded a copy of the Lead Inspection report. In the event that Wx professionals are working in the unit, and they are required to disturb an area of the unit which has not been tested by XRF Analysis, a RRP Certified Lead Renovator may utilize an EPA approved lead test kit to determine if lead is present in the area to be disturbed. See EPA's [Lead Test Kits](#). All users of the XRF analyzer and RRP Certified Lead Renovators must follow all regulations, guidelines, and laws set forth for their particular certification. At a minimum, IHCD requires the following information for a Lead Inspection report:

- Year the unit was built.
- XRF Trained Handler.
- Property address.
- Name of Lead Inspector.
- The instrument used for lead testing.
- Serial number of the instrument.
- Description of areas tested.
- XRF report (must include calibrations).

In addition to DOE, EPA, and SWS requirements, IHCD has established additional protocol which include safety with regard to the EPA's *de minimus* level of interior and exterior surfaces; and also, IHCD no longer allows subrecipients to *assume* the presence of lead-based paint. IHCD addresses *de minimus* surface area through the "We Care About Lead" policy. The purpose of this policy is to ensure the utmost safety of Wx professionals and occupants of Indiana Wx households. The safety protocol for the IHCD "We Care About Lead" policy is as follows:

- Conduct set up to prevent lead dust from contaminating the work area.
- Wet/moisten the surface area being disturbed.
- Limit access to the area where paint is being disturbed.
- Ensure that all appropriate personal protective equipment is utilized.
- Conduct necessary work.
- Ensure proper disposal of trash and material is removed from the job site.
- Provide photo of proof of using wet methods and appropriate set up.

Required Occupant Education

Concur with DOE Guidance ☒

Alternative Guidance ☐

Follow pre-renovation education provisions for EPA RRP Program When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

6.12 – Mold and Moisture

Allowable Actions

Allowed with DOE WAP H&S Funds ☒

Allowed with Alternative Funds ☐

Limited water damage repairs that can be addressed by weatherization workers are allowed when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measures. Source control (i.e. correction of moisture and mold creating conditions) is allowed when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measures. Source control is independent of latent damage and related repairs. This includes venting dryers properly.

Where severe Mold and Moisture issues cannot be addressed, deferral is required. Surface preparation where weatherization measures are being installed (e.g., cleaning mold off window trim in order to apply caulk) must be charged as part of the ECM, not to the H&S budget category. Air sealing may be utilized to mitigate moisture transport. It may be charged as an ECM or IRM. Air sealing may be charged to H&S only when done to stop bulk moisture intrusion that does not reduce the blower door.

Prohibited Actions

Concur with DOE Guidance ☒

Using DOE WAP H&S funds for mold cleanup is prohibited. Using DOE WAP H&S funds for window and door replacements is prohibited

Required Testing/Inspection

Concur with DOE Guidance ☒

Alternative Guidance ☐

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒

Alternative Funds ☐

Visual assessment for moisture or mold damage including exterior drainage.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds ☒

Allowed with Alternative Funds ☐

Moisture related issues can be addressed within H&S or IRM; however, mold clean-up is not an allowable health and safety cost.

Prohibited Testing/Inspection

Concur with DOE Guidance ☒

Using DOE WAP H&S funds for mold testing of any type is prohibited.

Required Occupant Education

Concur with DOE Guidance ☒

Alternative Guidance ☐

Moisture related issues can be addressed within H&S or IRM; however, mold clean-up is not an allowable health and safety cost.

6.13 - Occupant Pre-existing or Potential Health Conditions

Required Actions

Concur with DOE Guidance ☒

Alternative Guidance ☐

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒

Alternative Funds ☐

When a person's health may be at risk and/or WAP work activities could constitute an H&S hazard, the occupant is required to take appropriate action based on severity of risk. Deferral, if occupant risk cannot be mitigated.

Allowable Actions

Allowed with DOE WAP H&S Funds ☒

Allowed with Alternative Funds ☐

N/A

Required Testing/Inspection

Concur with DOE Guidance ☒

Alternative Guidance ☐

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒

Alternative Funds ☐

Screen occupants for known or suspected health concerns either as part of initial application for weatherization, during the audit, or both. This is done utilizing the “Occupant Pre-existing or Potential Health Condition Screening Form” required by WPN 22-7.	
Allowable Testing/Inspection	
Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
N/A	
Required Occupant Education	
Concur with DOE Guidance <input type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
Inform occupant in writing of any known risks and provide pre-weatherization screening form. Provide occupant with Subgrantee point of contact information in writing.	

6.14 – Pests		
Required Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input checked="" type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	
If sufficient funding is not available through DOE or other funding sources to eliminate the pest, the home must be deferred. Pest removal is allowed only where infestation would prevent weatherization. Infestation of pests may be cause for deferral where it poses H&S concern for workers and/or occupants.		
Allowable Actions		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>	
Screening of windows and points of access, and incorporating pest exclusion into air sealing practices to prevent intrusion is allowed		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
Assessment of presence and degree of infestation and risk to workers and occupants.		
Required Occupant Education		
Concur with DOE Guidance <input type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	
Sub-grantees will inform clients in writing of the observed condition and associated risks. When deferral is necessary, provide information in writing describing condition that must be met in order for weatherization to commence.		

6.15 – Radon		
Required Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
Clients must sign an informed consent form prior to receiving weatherization services. This form must be kept in the client file. Work scope must include precautionary measures based on EPA Healthy Indoor Environment Protocols for Home Energy Upgrades, to reduce the possibility of making radon issues worse. If in inaccessible areas, radon testing yields 4 or greater picocuries per liter of air, all exposed dirt floors within the pressure/thermal boundary must be covered with 6 mil (or greater) polyethylene sheeting, lapped at least 12” and sealed with appropriate sealant at all seams, walls and penetrations. If an area is not tested, all exposed dirt floors must be covered to SWS specifications. A copy of the client-signed informed consent form must be kept in the client file.		
Allowable Actions		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
Other precautions may include, but are not limited to, sealing any observed floor and/or foundation penetrations, including open sump pits, isolating the basement from the conditioned space, and ensuring crawl space venting is installed.		

Prohibited Actions	
Concur with DOE Guidance <input checked="" type="checkbox"/>	
Radon mitigation is not an allowable H&S cost.	
Allowable Testing/Inspection	
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
Radon testing is not currently required by IHCD. Sub-grantees may test at their discretion in areas with high radon potential. Radon mitigation is not an allowable Health and Safety cost.	
Required Occupant Education	
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
<p>Confirmation that EPA's A Citizen's Guide to Radon was received and radon related risks discussed with the client. Provide all clients EPA's A Citizen's Guide to Radon and inform them of radon related risks. Informed consent form must include:</p> <ul style="list-style-type: none"> • Information from the results of the IAQ Study that there is a small risk of increasing radon levels when building tightness is improved • A list of precautionary measures WAP will install based on EPA Healthy Indoor Environment Protocols • Some of the benefits of Weatherization including energy savings, energy cost savings, improved home comfort, and increased safety 	

6.16 – Safety Devices: Smoke and Carbon Monoxide Alarms, Fire Extinguishers		
Required Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
<p>Smoke Alarms Install smoke alarms in accordance with UL217 in units where they are not present or are inoperable. At a minimum, each unit is required to have at least one smoke alarm on each level near the bedrooms. All smoke alarms will be installed per manufacturer specifications. Select battery operated smoke alarms that are listed and labeled in accordance with UL217 and have sealed, non-replaceable, 10-year batteries. Auditors must check the functionality and expiration date on all existing smoke alarms.</p> <p>Carbon Monoxide Alarms Select CO alarms that are listed and labeled in accordance with UL2034, or approved by the authority having jurisdiction, and have a minimum of 10-year manufacturer's warranty and contain internal non-replaceable batteries. All weatherized units must contain at least one CO alarm per floor, including all electric homes. Auditors must check the functionality and expiration date on all existing CO alarms. All CO alarms must be installed per manufacturer specifications.</p>		
Allowable Actions		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
Where solid fuel burning equipment is present, fire extinguishers may be provided as an allowable H&S measure.		
Prohibited Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
Using DOE WAP H&S funds for replacement of functional smoke or CO alarms that are not beyond the manufacturer's stated lifetime is prohibited.		
Required Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
Check existing alarms for operation and expired expiration date. When solid fuel burning equipment is present and there is an existing fire extinguisher present, check the expiration date. Verify operation of installed alarms.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
N/A		

Required Occupant Education	
Concur with DOE Guidance <input type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
Provide client with verbal and written information on use of devices installed.	

6.17 – Ventilation and Indoor Air Quality		
Required Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
Indiana has implemented ASHRAE 62.2 – 2016. If client refuses ventilation as required by ASHRAE 62.2-2016, the unit must be deferred.		
Allowable Actions		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
N/A		
Required Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
Each home is evaluated to meet the ASHRAE 62.2-2016 standard at the initial audit. An ASHRAE 62.2-2016 calculator is utilized to estimate whole house ventilation needs. At the Quality Control Inspection, the same calculator is utilized to verify compliance with ASHRAE 62.2-2016 Standard.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
N/A		
Required Occupant Education		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	
Provide client with information on function, use, and maintenance (including location of service switch and cleaning instructions) of ventilation system and components. Provide client with equipment manuals for installed equipment. Include disclaimer that ASHRAE 62.2-2016 does not account for high polluting sources or guarantee indoor air quality.		

6.18 – Water Heaters		
<i>(see Combustion Appliances for combustion related requirements)</i>		
Allowable Actions		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
<p>Water heaters are an allowable H&S cost when they are leaking, there are elevated CO levels beyond the safety threshold, repair cannot yield a safe water heater, there are electrical hazards, beyond cost effective repair, or the cost of repair is more than 50% the cost to replace. If not listed above, additional replacements may be allowable on a case by case basis when approved by IHCD.</p> <p>Minor safety repairs of water heaters is allowable (e.g., T&P valve piping, backflow prevention devices, expansion tanks). It is allowable to replace, repair, or install primary water heater heaters when existing primary water heater is unsafe, inoperable, or nonexistent.</p>		
Required Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
Visual inspection and required completion of appropriate IHCD Appliance Inspection Form		
Allowable Testing/Inspection		

Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
N/A	
Required Occupant Education	
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
Provide information on appropriate use and maintenance of units. Provide all paperwork and manuals for any installed equipment. Where combustion equipment is present, provide combustion safety and hazards information including how to recognize depressurization, dangers of CO poisoning, and fire risks associated with combustion appliance use.	

6.19 – Worker Safety		
Required Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
<p>Weatherization Professionals must follow OSHA standards where required and take precautions to ensure the H&S of themselves and other workers. All sub-grantees and contractors must maintain compliance with the current OSHA Hazard Communication Standard (HAZCOM Standard), including on-site organized Safety Data Sheets (SDS) (formerly called MSDS). HAZCOM Standard requires frequent and regular safety meetings. Grantee offers four Competency Maintenance Refreshers (CMR) each year. All Wx professionals must attend at least one CMR per year in which safety aspects of weatherization are covered.</p> <p>In the event of a local, regional, or national emergency or crisis, Grantee will direct IREC accredited training provider to provide additional required training to address specific emergency crisis, e.g., infectious disease training, COVID training, and refresher on proper PPE and respiratory protection. Within the Indiana sub-grantee required OSHA training curriculum, Module 11- Confined Space, is covered in the OSHA 10 course provided by the IREC accredited training provider for Indiana.</p> <p>Each sub-grantee is required to have a written internal agency Injury and Illness Prevention Plan. OSHA states the responsibility of protecting employees is incumbent upon the employer(sub-grantee) to provide frequent and regular safety meetings for employees. All sub-grantees are required to have and follow an approved respiratory protection policy/illness Prevention Program.</p> <p>Grantee monitoring to ensure all required safety trainings and written policies are in place at the sub-grantee level. Grantee Monitoring will ensure sub-grantees provide documentation of compliance in providing “frequent and regular” safety meetings for employees. All COVID/Infectious disease OSHA standards must be followed. Environmental and surveillance testing as required by OSHA is allowable.</p>		
Allowable Actions		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
N/A		
Prohibited Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
Using DOE WAP H&S funds for major repairs as defined by the Grantee’s H&S Plan is prohibited.		
Define “major” repairs		
A repair exceeding \$1,200.00 for one measure is considered a major repair.		
Allowable Testing		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
N/A		

6.X – (Insert Additional H&S Items for Use of DOE WAP H&S funds)		
Required Actions		
Concur with DOE Guidance <input type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
Insert required item text		
Allowable Actions		
Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
If DOE WAP H&S Funds are used for any “allowable” actions, detail them here.		
Prohibited Actions		
Concur with DOE Guidance <input type="checkbox"/>		
What is prohibited		
Required Testing/Inspection		
Concur with DOE Guidance <input type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
Insert required item text		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.		
Prohibited Testing/Inspection		
Concur with DOE Guidance <input type="checkbox"/>		
What is prohibited		
Required Occupant Education		
Concur with DOE Guidance <input type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	
Insert required item text		